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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, *et al.*,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

**DECLARATION OF SHANA E.
SCARLETT IN SUPPORT OF
CONSUMER PLAINTIFFS' MOTION
TO EXCLUDE FURTHER TESTIMONY
OF DR. CATHERINE TUCKER**

This Document Relates To: *All Consumer
Actions*

The Hon. James Donato
Hearing Date: June 20, 2024
Hearing Time: 10:00 a.m.

1 I, Shana E. Scarlett, declare under penalty of perjury as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the State of
3 California. I am a partner with the law firm Hagens Berman Sobol Shapiro LLP (“Hagens
4 Berman”), one of the attorneys of record for Consumer Plaintiffs in the above-titled action. I submit
5 this declaration in support of Consumer Plaintiffs’ motion to exclude testimony of Dr. Catherine
6 Tucker.

7 2. I have personal knowledge of the matters stated herein and, if called upon, I could
8 and would competently testify thereto.

9 3. Attached hereto as Exhibit 1 is a true and correct copy of Dr. Catherine Tucker’s
10 Opening Merits Report (January 12, 2024).

11 4. Attached hereto as Exhibit 2 is a true and correct copy of Dr. Catherine Tucker’s
12 Rebuttal Merits Report (February 9, 2024).

13 5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of Dr. Nicholas
14 Economides’ Opening Merits Report (January 12, 2024).

15 6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the deposition
16 transcript of Dr. Catherine Tucker (March 6, 2024).

17 7. Attached hereto as Exhibit 5 is a true and correct copy of an excerpt of the deposition
18 transcript of Dr. John List (March 1, 2024).

19 8. Attached hereto as Exhibit 6 is a true and correct copy of two Reddit posts cited in
20 footnote 99 of paragraph 49 of Dr. Tucker’s January 12, 2024 Opening Merits Report.

21 9. Attached hereto as Exhibit 7 is a true and correct copy of an excerpt of Exhibit 2534
22 marked at the March 6, 2024 deposition of Dr. Tucker.

23
24 I declare under penalty of perjury under the laws of the United States that the foregoing is
25 true and correct. Executed this 5th day of April 2024 at Oakland, California.

26 By /s/ Shana E. Scarlett
27 Shana E. Scarlett
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